

From: [Hall, Steven G.](#)
To: [Wroble, Julie](#); [Fowlow, Jeffrey](#)
Cc: [Terada, Calvin](#); [Villa, Clifford](#); [Fleming, Sheila](#)
Subject: RE: Ashue
Date: Thursday, May 16, 2013 4:14:24 PM

I discussed the sampling approach with Julie, and she asked that I send this update to everyone.

For a removal assessment at the Ashue Road site, we were not thinking about performing a traditional activity-based sampling approach similar to what EPA has performed at other sites, with multiple scenarios of typical daily activities that residents or site visitors may perform in the contaminated area.

Instead, a few months ago we had discussed several options for the PRPs (or EPA) to address the debris at the site:

1. Assume that ACM and/or asbestos exposure risks may be present, and dispose of the debris as asbestos waste.
2. Assume that the debris needs to be removed and disposed of properly as solid waste, but perform the work in such a way that is protective of workers because of the presence of asbestos fibers, or until a negative exposure assessment demonstrates that there are no exposure risk. During the loading activities, have a plan to monitor for ACM and deal with it appropriately if encountered.
3. Perform a removal assessment of the debris pile, using heavy equipment to search through the debris pile for ACM in areas that were previously inaccessible. During the removal assessment, field staff will wear appropriate PPE and personal sampling pumps, and area sample pumps will also collect air samples for asbestos analysis.

So instead of proposing a formal ABS study, option 3 was intended to investigate the debris pile for ACM, while also collecting air samples from personal and fixed locations to determine if the disturbance of the pile generated any airborne asbestos fibers. In essence, this would be an "opportunistic" ABS which would represent a "loading for off-site disposal" scenario, but it was not intended to be a typical or formal ABS study.

I hope this clarifies the approach -- please let me know if there are any questions or comments.

Thanks,
Steve

-----Original Message-----

From: Wroble, Julie [<mailto:Wroble.Julie@epa.gov>]
Sent: Thursday, May 16, 2013 11:23 AM
To: Fowlow, Jeffrey
Cc: Terada, Calvin; Hall, Steven G.; Villa, Clifford; Fleming, Sheila
Subject: RE: Ashue

ATTORNEY-CLIENT PRIVILEGED

I just got off the phone with Cliff Villa. While I understand the need for putting together a cost estimate to do ABS, I would hope that we would not proceed with ABS until we have more compelling evidence that ACM was disposed of in the pile on the Ashue Road property. The few microvac samples with positive detections for asbestos do not constitute compelling evidence for me.

I agree that there is likely a solid waste issue here that needs addressing, but based on the information I reviewed in the letter from Joyce Ziker Parkinson to EPA dated 4/16/13, it doesn't appear as if ACM was disposed on the property. In fact, the Contractor Group appears to have manifests for the ACM that was taken to an appropriate facility. If that is not the case, then please provide me additional information to support this concern.

I would only perform ABS if after digging through the pile, suspect ACM is found and confirmed to contain asbestos.

Please call or e-mail me if you'd like to discuss this further.

Thanks.
Julie

-----Original Message-----

From: Fowlow, Jeffrey
Sent: Wednesday, May 15, 2013 5:23 PM
To: Wroble, Julie
Subject: FW: Ashue

Hi, Julie. I currently am in Walla Walla on a removal site. I just wanted to let you know that it appears we've been ignored by the "contractor group" from the Ashue Road PRPs. I informed Calvin and Cliff and below is Cliff's response. I spoke to Steve Hall and asked him to prepare an estimate and a conceptual plan to do activity based sampling if that is the route my manager's think we should take. Steve will probably contact you soon to coordinate and include your thoughts.

Thanks for the help.

-----Original Message-----

From: Villa, Clifford
Sent: Wednesday, May 15, 2013 3:54 PM
To: Fowlow, Jeffrey; Terada, Calvin
Subject: RE: Ashue

ATTORNEY-CLIENT PRIVILEGED

Jeff: Thanks for the update. I share your frustration, and think we are now done with them. I take it we have not received any writing from the County and Yakama Nation urging EPA to proceed, as we discussed on the phone three weeks ago (4/25). If that is so (please confirm), I will call attorneys for the County and Nation this week to urge them to get some writing to us. Then it's up to ECL management to make a decision on proceeding with Fund-lead removal . . . and someone will need to write an action memo.

Clifford J. Villa
Assistant Regional Counsel
U.S. Environmental Protection Agency, Region 10
(206) 553-1185 (office) | (206) 419-2744 (cell)

-----Original Message-----

From: Fowlow, Jeffrey
Sent: Wednesday, May 15, 2013 3:22 PM
To: Villa, Clifford; Terada, Calvin
Subject: FW: Ashue

FYI...Below is the email I sent to Scott Parker of Argus Pacific following a phone conversation he and I had on Wednesday, May 8.

Another week has passed and he has not contacted me in any way. It has been about one month since the "contractor group" proposed conducting their own investigation. In one month, they've initiated

exactly one 10-minute phone call. If their contractor is unable to commit to a conference call to come to an agreement about the scope of the assessment that they proposed doing, it is clear the "contractor group" is not going to be responsive to this situation.

-----Original Message-----

From: Fowlow, Jeffrey
Sent: Wednesday, May 08, 2013 2:39 PM
To: sparker@arguspacific.com
Cc: Wroble, Julie
Subject: Ashue

Scott:

Thanks for getting back to me today. I am copying Julie Wroble who is a toxicologist at EPA. At the conclusion of our conversation, we agreed you would send us 3 or 4 open dates and times that you are available to discuss your sampling plan. Julie and I will select one of those times for a conference call. I am assuming those times will be NLT Wednesday next week. If you are ready and available on this Friday, that works particularly well for me. We also agreed that you would provide at least an outline of the type and number of samples you are considering, plus the analytical methods and other such general sampling concepts you are planning. You acknowledged it is critical that we coordinate on the sampling strategy before you put too much effort into it. Please send us the list of choices ASAP.

Thanks,
Jeffrey Fowlow
EPA

Message scanned by the Symantec Email Security service. If you suspect that this email is actually spam, please send it as an ATTACHMENT to spamsample@messagelabs.com